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23 *Attorneys for Defendant Meta Platforms, Inc.*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

1 JOHN DOE & JANE DOE, on behalf of
2 themselves and all others similarly situated,

3 Plaintiffs,

4 v.

5 META PLATFORMS, INC.,

6 Defendant.

7 Case No. 3:22-cv-07557-SI

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**STIPULATION TO EXTEND TIME FOR
DEFENDANT META PLATFORMS, INC. TO
RESPOND TO PLAINTIFFS' COMPLAINT**

3 Action Filed: December 1, 2022

4 Honorable Judge Susan Illston

5 Trial Date: None Set

1 Pursuant to Civil Local Rule 6-1(a), Plaintiffs John Doe and Jane Doe and Defendant Meta
2 Platforms, Inc., by and through their respective counsel of record, hereby stipulate as follows:

3 WHEREAS, plaintiffs filed this action on December 1, 2022, in the Northern District of
4 California;

5 WHEREAS, Meta was served with the Complaint on December 8, 2022;

6 WHEREAS, on December 19, 2022, the parties stipulated to an extension of time for Meta to
7 respond to the Complaint until February 2, 2023;

8 WHEREAS, on January 10, 2023, Meta filed an administrative motion to relate this case to the
9 consolidated action *In re Meta Pixel Healthcare Litigation*, Case No. 3:22-cv-03580 (the “Consolidated
10 Action”), currently pending before Judge Orrick, and have this case consolidated with the
11 Consolidated Action for purposes of discovery, Consolidated Action Dkt. 164;

12 WHEREAS, pursuant to Judge Orrick’s October 12, 2022 order in the Consolidated Action, if
13 the Court determines that a case is related to the Consolidated Action, that case “shall be consolidated
14 into [the Consolidated Action] unless a party objects to consolidation within fourteen days of the related
15 case order,” Consolidated Action Dkt. 73 at 3;

16 WHEREAS, Meta has requested, and plaintiffs have agreed, that any response to the Complaint
17 should not be due until after Judge Orrick has denied the motion to relate or, if the motion to relate is
18 granted, until Judge Orrick issues a ruling on consolidation;

19 WHEREAS, the additional time to respond to the Complaint will not alter the date of any event
20 or deadline set by this Court, and the additional time will conserve party and judicial resources;

21 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between plaintiffs and Meta,
22 subject to the Court’s approval, that Meta shall have 45 days from the date that Judge Orrick denies the
23 motion to relate or issues an order on consolidation in the Consolidated Action to respond to the
24 Complaint in this Action.

25 IT IS SO STIPULATED.

1 Dated: January 18, 2023

GIBSON, DUNN & CRUTCHER LLP

2 By: /s/ Lauren R. Goldman
3 Lauren Goldman

4 Dated: January 18, 2023

5 COOLEY LLP

6 By: /s/ Michael G. Rhodes
7 Michael G. Rhodes

8 *Attorneys for Meta Platforms, Inc.*

9 Dated: January 18, 2023

10 THE LAW OFFICES OF STEVEN C. VONDTRAN, PC

11 By: /s/ Steven C. Vondran
12 Steven C. Vondran, Esq.

13 Dated: January 18, 2023

14 THE HODA LAW FIRM, PLLC

15 By: /s/ Marshal J. Hoda
16 Marshal J. Hoda, Esq. (*admitted pro hac vice*)

17 Dated: January 18, 2023

18 FOSTER YARBOROUGH PLLC

19 By: /s/ Patrick Yarborough
20 Patrick Yarborough, Esq. (*admitted pro hac*
21 *vice*)

22 *Attorneys for Plaintiffs*

23 **CIVIL L.R. 5-1(h)(3) ATTESTATION**

24 Pursuant to Civil Local Rule 5-1(h)(3), I, Lauren Goldman, hereby attest under penalty of
25 perjury that concurrence in the filing of this document has been obtained from all signatories.

26 Dated: January 18, 2023

27 GIBSON, DUNN & CRUTCHER LLP

28 By: /s/ Lauren R. Goldman
Lauren Goldman